



**U.S. Department of Justice**

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**Tax Division**

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August 7, 2018

**VIA ECF FILING**

The Honorable Denis R. Hurley  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: Discovery Deadline  
*Estate of Richard Siegal v. United States*, Case No. 2:16-cv-06411 (E.D.N.Y.)

Dear Judge Hurley:

Pursuant to your Individual Practice Rule 2.A., the United States and the Estate of Richard Siegal respectfully submit this joint letter seeking clarification of the discovery deadline in the above-referenced matter. The discovery schedule (Docket No. 29-1), made effective by Magistrate Judge Shields's order dated March 2, 2018, provides a fact discovery deadline of December 7, 2018, and an expert discovery deadline of March 8, 2019.

Recently the United States filed via ECF a letter requesting a pre-motion conference regarding the United States' anticipated motion for partial summary judgment. On August 2, 2018, this Court denied that request "as pre-mature in light of the extension of all discovery deadlines to **September 28, 2018**." The parties submit this letter to confirm that the discovery schedule set forth in Docket No. 29-1 continues to govern discovery in this case, and that the Court's August 2, 2018 order did not modify those deadlines.

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Respectfully submitted,

/s/Steven M. Kaplan (w/permission)

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 7, 2018, I electronically filed the foregoing letter with the Clerk of Court using the CM/ECF system which will notify all registered participants, including:

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